

# EXHIBIT B

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GOOGLE LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO**

ANIBAL RODRIGUEZ, *et al.* individually and  
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688

**[PROPOSED] ORDER RE: PLAINTIFFS'  
REQUEST FOR GOOGLE TO EMPLOY  
SEARCH TERMS FOR 19 ADDITIONAL  
CUSTODIANS**

Judge: Hon. Alex G. Tse

Courtroom: A, 15th Floor

Action Filed: July 14, 2020

Trial Date: Not Set

**[PROPOSED] ORDER**

Before the Court is the parties' Joint Letter Brief regarding Plaintiffs' request for Google to employ search terms for 19 additional custodians ("Additional 19 Custodians Search Term Letter Brief").

Having considered the Additional 19 Custodians Search Term Letter Brief, the Court orders that Google should search the below terms as indicated with an "X" in the column labeled "Google to Search":

No.	Search Terms	Google to Search:	
		GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
1	WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR WSH OR (Web /2 "App Activity")	X	

<sup>1</sup> Unless otherwise indicated, Google is to employ the terms identified with an "X" in this column for Sree Pothana, Dan Stone, Donald Harrison, Jason Titus, and Xinyu Ye. In certain cases, Google is only to employ the term identified for a subset of custodians in a column. In those cases, the label "GA4F" refers to Pothana and Stone; "Firebase" refers to Harrison and Titus; and "Data" refers to Ye.

<sup>2</sup> Unless otherwise indicated, Google is to employ the terms identified with an "X" in this column for Greg Fair, Dale Nil, Nick Linkow, Katie Brennan (Virk), Jan Hannemann, Guemmy Kim, Mark Risher, Rahul Roy-Chowdhury, Chris Ruemmler, Eric Miraglia, Sam Heft-Luthy, Stephan Micklitz, and Keith Enright. In certain cases, Google is only to employ the term identified for a subset of custodians in a column. In those cases, the label "WAA" refers to Greg Fair, Dale Nil, Nick Linkow, Katie Brennan (Virk), Jan Hannemann, Guemmy Kim, Mark Risher, Rahul Roy-Chowdhury; "Privacy" refers to Chris Ruemmler, Eric Miraglia, Sam Heft-Luthy, Stephan Micklitz; "Counsel" refers to Keith Enright.

No.	Search Terms		Google to Search:	
			GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
2	WAA OR WAAH OR WAAs OR sWAA OR “W&AA” OR “W&AAs” OR “Web/App” OR “web history” OR WSH OR (Web /2 “App Activity”)			
	/50	disclos* “your activity” analytics scion function* “event data” “measurement data” firebase	X	X
	/25	benefits “data collection” “privacy policy”		
	/10	plan* feature launch		
3	WAA OR WAAH OR WAAs OR sWAA OR “W&AA” OR “W&AAs” OR “Web/App” OR “web history” OR WSH OR (Web /2 “App Activity”)		X	
	/50	benefits “data collection” “privacy policy” plan* feature launch		
4	WAA OR WAAH OR WAAs OR sWAA OR “W&AA” OR “W&AAs” OR “Web/App” OR “web history” OR WSH OR (Web /2 “App Activity”)		X	X
	/25	consent		
5	WAA OR WAAH OR WAAs OR sWAA OR “W&AA” OR “W&AAs” OR “Web/App” OR “web history” OR WSH OR (Web /2 “App Activity”)		X	Privacy: X
	/50	consent		Not WAA + Counsel

No.	Search Terms				Google to Search:	
					GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
6	(WAA OR sWAA OR WAAH OR “W&AA” OR “W&AAs” OR Firebase OR GA4F OR authenticat*) AND (CFS OR “Consent Flow Service”)				X	X
7	(WAA* OR sWAA OR “my account” OR “my activity”) /50 “App Indexing”				X	X
8	(WAA* OR sWAA OR “app activity”) /15 (“My Account” OR “My Activity”)				X	
9	(“new ad control” OR “new ads control” OR “new ads controls” OR “new ad controlling” OR “new ads controlling” OR “new ad controls” OR “new ad controlled” OR “new ads controlled” OR NAC)				X	
	/25	benefits “data collection” “privacy policy” consent* function disclos* analytics GA4F	scion “event data” “measurement data” plan feature launch WAA* sWAA	“app activity” AdMob FCM “Cloud Messaging” firebase permi* allow*		
10	“app activity”				X	
11	“activity controls”				X	
12	“your Google Account”				X	
13	“activity data” OR “app data”					
14	“allow Google to save”				X	X
15	“activities and info you allow Google to save”				X	X
16	“your searches and activity”				X	X
17	“to let Google save”				X	X
18	“must be on”				X	X
19	“on-device search”				X	X
20	“Screenwise Trends”				X	X
21	safeguard* /2 “your data”				X	X
22	“Firebase Terms of Service”				X	X
23	apps /4 “use Google services”				X	X
24	“Google Data Collection”				X	X

No.	Search Terms	Google to Search:	
		GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
25	“defaulted to on”	X	X
26	“Google Analytics browser add-on”	X	X
27	“non-Google branded”	X	X
28	“apps using Google Analytics”	X	X
29	“data about app users”	X	X
30	“what we collect” “data we collect”	X	WAA: X Not Privacy + Counsel
31	“use policy” automatic* /2 collect* product* AND (integrat* AND “third-party apps”)	X	WAA + Privacy: X Not Counsel
32	(“on OR off” OR “switch the collection”) AND (WAA OR WAAH OR WAAs OR sWAA OR “W&AA” OR “W&AAs” OR “web history” OR “WHSH” OR (Web pre/2 “App Activity”)) AND NOT (“Location History”)	X	X
33	“on OR off” OR “switch the collection”	GA4F + Data: X	X <sup>3</sup>
		Not Firebase	
34	“on/off” /5 control*	X	WAA: X Not Privacy + Counsel
35	“Privacy Policy” /15 (chang* OR amend* OR modif* OR alter*)	X <sup>4</sup>	n/a <sup>5</sup>
36	“Privacy Policy” /10 (confus* OR inaccurate* OR (not /3 accurate*) OR incorrect* OR (not /3 correct*) OR mislead* OR wrong* OR false* OR flaw* OR (not /3 tru*) OR WAA* OR sWAA OR “my activity”)	X	X

<sup>3</sup> Only for custodian Fair.<sup>4</sup> Excluding custodian Ye.<sup>5</sup> Not in dispute.

No.	Search Terms		Google to Search:	
			GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
37	("My Account" OR "My Activity") /15 (consent OR pseudonymous OR (still /5 collect*))		X	
38	(user* OR consumer* OR customer* OR people*) /10 (confus* OR misunderstand* OR misle*)		X	
	(user* OR consumer* OR customer* OR people*) /10 (underst* OR comprehen* OR consent OR know OR represent* OR disclos*)			
39a	/10	(WAA* OR sWAA OR GA4F OR "GA for Firebase" OR "Google Analytics" OR scion OR FCM OR "Firebase Cloud Messaging" OR AdMob)	X	X
39b	/20			
40	wiretap*			
41	"page_location"		X	X
42	"page_referrer"		X	X
43	"page_title"		X	X
44	"screen_resolution"		X	X
45	correlate* /5 data		X	X
46	correlate /15 (user OR account OR profile)		X	X
47	associate /2 account		X	X
48	(associat* /15 (user OR account OR profile)) AND ("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion		X	X
49	associat* /10 ((user OR account OR profile) /5 (data OR activit* OR event* OR interact* OR log*))		X	
50	(shadow OR secret OR hidden) /2 (profil* OR account)		X	X
51	(((third pre/1 (party OR parties)) OR 3P) /2 develop*) AND ((collect* OR stor* OR "use" OR using OR delet* OR disclos*) /15 location)		X	X
52	(authentic* OR reauthentic*) /10 (data OR log OR logs OR logged OR logging OR info OR information)		GA4F + Data: X	
			Not Firebase	
53	(PII OR ((personal OR personally) /5 info*)) /15 ((WAA* OR "sWAA") OR "app activity" OR consent OR pseudonymous OR (still /5 collect*) OR (join* /5 risk*))		X	
54	pseudony*			

No.	Search Terms	Google to Search:	
		GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
55	("real time" /20 bid*) OR RTB	GA4F + Data: X	X <sup>6</sup>
		Not Firebase	
56	"Google Analytics for Firebase" OR "GA for Firebase" OR GA4F		X
57	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /25 gaia	X	X
58	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /15 (consent OR function OR disclos* OR plan OR feature OR benefits OR "data collection" OR "privacy policy")	X	WAA + Privacy: X Not Counsel
59	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /10 launch	GA4F + Firebase: X Not Data	X
60	("GA4F" OR "GA for Firebase" OR "Google Analytics" OR scion) /15 (conversion* OR perform* OR event OR audience)		WAA: X Not Privacy + Counsel
61	Gold /5 conversion Gold /15 (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR perform* OR event OR audience)		WAA: X Not Privacy + Counsel
62	"Firebase SDK" OR "Firebase Software Development Kit"	X <sup>7</sup>	n/a <sup>8</sup>
63	Firebase /15 (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR appmeasurement OR AdMob OR "Google mobile service" OR GMS OR Clearcut)		

<sup>6</sup> Only for custodian Fair.<sup>7</sup> Only for custodian Titus.<sup>8</sup> Not in dispute.



No.	Search Terms	Google to Search:	
		GA4F / Firebase / Data <sup>1</sup>	WAA / Privacy / Counsel <sup>2</sup>
64	(FCM OR “cloud messaging”) /15 (Gold OR analytics OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR “my account” OR “my activity” OR conversion* OR perform* OR event OR audience)	GA4F + Data: X	X
		Not Firebase	
65	AdMob /15 (Gold OR “Google Analytics” OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR “my account” OR “my activity” OR conversion* OR FCM OR “cloud messaging” OR “Google Mobile Platform” OR GMP)	X	X
66	(“Google Mobile Service” OR GMS) /25 ((Gold OR analytics OR GA4F) AND (log* OR user /2 data OR measurement))		X
67	(“Google Mobile Service” OR GMS OR Clearcut) /15 (Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP)		
68	(“Google Mobile Services” OR GMS OR analytics OR perform* OR event OR audience) /15 AdMob		
69	(“Google Mobile Service” OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR scion OR “Google Mobile Platform” OR GMP OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* OR sWAA OR “my account” OR “my activity” OR conversion* OR perform* OR event OR audience OR FCM OR “cloud messaging” OR AdMob)		
70	(“Google Mobile Platform” OR GMP) /15 (conversion* OR perform* OR event OR audience)		
71	(“Google Mobile Platform” OR GMP OR Analytics OR GA4F OR Scion) AND (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR “my account” OR “my activity” OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement)		

No.	Search Terms	Google to Search (for Custodian <u>Arne de Booi</u> ):
A1	("WAA" OR "WAAH" OR "WAAs" OR "sWAA" OR "W&AA" OR "W&AAs" OR "Web/App")	X
	<div>AND</div> <div> study  studies  confus*  privacy  understanding  misunderst*  misle*  ppt*  participant*  CFS  "Consent Flow Service" </div>	
	<div>/50</div> <div> disclos*  "your activity"  firebase  analytics  scion  function*  "event data"  "measurement data" </div>	
	<div>/25</div> <div> consent  benefits  "data collection"  "privacy policy" </div>	
	<div>/10</div> <div> plan*  feature  launch </div>	
A2	"WAA" OR "WAAH" OR "WAAs" OR "sWAA" OR "W&AA" OR "W&AAs" OR "Web/App" OR "web history" OR "WHS" OR (Web /2 "App Activity")	
A3	("WAA" OR "WAAH" OR "WAAs" OR "sWAA" OR "W&AA" OR "W&AAs" OR "web history" OR "WHS" OR (Web pre/2 "App Activity")) /50 (consent OR plan* OR feature OR launch OR benefits OR "data collection" OR "privacy policy")	

No.	Search Terms	Google to Search (for Custodian <u>Arne de Booi</u> ):
A4	("My Account" OR "My Activity") /15 (WAA* OR sWAA OR "app activity" OR consent OR pseudonymous OR (still /5 collect*))	
B1	(user* OR consumer* OR customer* OR people*) /10 (underst* OR comprehen* OR consent OR know OR represent* OR disclos*) /10 (WAA* OR sWAA OR GA4F OR "GA for Firebase" OR "Google Analytics" OR scion OR FCM OR "Firebase Cloud Messaging" OR AdMob)	X
B2	(user* OR consumer* OR customer* OR people*) /10 (confus* OR misunderstand* OR misle*)	
B3	(user* OR consumer* OR customer* OR people*) /10 (underst* OR comprehen* OR consent* OR know* OR represent* OR disclos*) /20 (WAA* OR sWAA OR GA4F OR "GA for Firebase" OR "Google Analytics" OR scion OR FCM OR "Firebase Cloud Messaging" OR AdMob)	
C1	"on/off" /5 control*	X
C2	"on or off" AND (WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "web history" OR "WHS" OR (Web pre/2 "App Activity")) AND NOT ("Location History")	X
C3	"switch the collection" AND (WAA OR WAAH OR WAAs OR sWAA OR "W&AA" OR "W&AAs" OR "web history" OR "WHS" OR (Web pre/2 "App Activity")) AND NOT ("Location History")	X
C4	"on OR off" OR "switch the collection"	
D1	"allow Google to save" "your searches and activity" "page_location" "page_referrer" "page_title" "screen_resolution"	X
D2-D41	None	

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Alex G. Tse  
United States Magistrate Judge